

## Privacy Policy

Chatur Wealth aims to protect your personal information and ensure that you continue to trust us with your personal data. When you interact with us, you may share your personal information with us which allows us to determine your identity as an individual (e.g. name, email, address, telephone number, login user names, passwords etc.)

This policy is drafted in consonance with the applicable legal provisions and applies to the Personal Data that we collect for the purposes of providing you our valuable services and an enhanced user experience on our Website or Platforms ("Policy"). Chatur Wealth reserves the right to make changes to this Policy at any time, which shall be duly informed to you via notification on the Website or Platforms. We encourage you to regularly review this Policy to ensure that you are aware of changes made to it from time to time.

### 1. INFORMATION COLLECTED FROM THE USER

Chatur Wealth shall collect Personal Data through its Website or Platforms when you contact us through the Website or Platforms to provide any financial information or comments in electronic form. The Website or Platforms may also track information furnished online to provide the services that you request or through any other media available on the Website or Platforms, for the purposes of public announcements and messages about the services and products offered by it or in which you may be interested.

Personal Data may also be collected from information you may choose to share with a particular service provider or provide publicly as comments, feedback or reviews through the Website or Platforms.

Chatur Wealth shall collect client's Personal Data from the following sources:

a) Client agreements and other information that clients provide to us, whether in writing, in person, by telephone, electronically or by any other means. This information may include client's income, investment experience, credit references etc...

b) Personal tax returns and other documents provided by the client

c) Public sources

d) Offline interactions with Chatur Wealth.

The Website or Platforms also collect certain technical information, including, inter alia, log data, analytics code, etc. that you do not visibly enter and which are automatically collected during your access or use of the Website or Platforms, such as, IP address, version and identification number of the device, browser type, browser language, the date and time of your request, your profiles, search terms used, and location data, among others.

The Website or Platforms may also collect anonymous data that is not associated with or linked to user's Personal Data (" Anonymous Data") and which, by itself, does not permit the identification of an individual user.

We use the secure payment gateway to process your payments. We do not store any details of your credit card, debit card or net-banking account.

## 2. SECURITY AND STORAGE OF YOUR PERSONAL DATA

Your Personal Data shall be stored securely on servers hosted by reputed cloud service providers ("CSP") located in India. Such CSP shall be liable to keep your Personal Data secure at all times and adopt such technical measures as may be required to meet your reasonable expectation of privacy.

## 3. USE OF PERSONAL INFORMATION COLLECTED

The Website or Platforms may use Personal Data and other information collected from you for any of the following purposes-

to effectively provide the services opted by you such as opening of trading account, investment advisory services, and other services incidental hereto

for the purposes of improving the features and functionality of the Website or Platforms and to respond to the various requests and preferences, including language and location customization, personalized help and instructions, or other responses to the use of the Website or Platforms

to maintain the quality of the services on the Website or Platforms, provide anonymous aggregated reporting for internal audits and provide general statistics regarding their use

- to deliver products and services, including newsletters and email notifications, confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages that you may request
- archival or backup purposes
- to send SMS text alerts to the user on their registered mobile number about the products and services including new services, special offers, promotions, updated information and other services that allow access to exclusive features or functionality of the Website or Platforms

#### 4. DISCLOSURE OF PERSONAL INFORMATION

Chatur Wealth shall not disclose your Personal Data to any third party for any reason whatsoever, without your express consent to that effect. However, your Personal Data may be disclosed to or shared with a third party without your consent under the following circumstances:

- Pursuant to any specific legislation such as SEBI Act, 1992, LLP Act, 2008 and Income Tax Act, 1961 etc and all the rules and regulations made there under
- Pursuant to a valid and subsisting order of a court or other judicial, quasi judicial or government body under applicable laws or if, in Chatur Wealth good faith judgment, such legal disclosure is reasonably necessary to comply with legal processes or respond to any claims
- In the event of change in control or management of Chatur Wealth, a full or partial merger with, or acquisition of all or part of Chatur Wealth by another company
- Disclosure to third parties such as broker, agent, and other service providers who work for or in connection with the services provided by Chatur Wealth, subject to confidentiality obligations as may be contractually agreed to between such third party and Chatur Wealth
- To detect and prevent any identity theft, fraud and other potentially illegal acts, prevent the abuse of Websites' services, any disclosure reasonably necessary to enforce the rights of Chatur Wealth, Terms and Conditions or this Policy including any claims of infringement or violation of any third-party rights or provisions of Information Technology Act, 2000 and rules made there under or any applicable legal provisions
- To protect the rights and property, whether tangible or intangible, including without limitation, intellectual property, or to ensure the personal safety of the Website or Platforms, the users or public at large.

#### 5. PROCESSING YOUR PERSONAL DATA

Chatur Wealth takes all reasonable steps to ensure fair, lawful and transparent processing of your Personal Data. In furtherance of this objective, Chatur Wealth will:

- notify you in case of usage of your Personal Data for any purpose other than the purposes consented for or stated in this Policy.
- retain Personal Data only as long as it is necessary for rendering the services and this period shall not exceed four (4) years from the date of termination of your services with Chatur Wealth on the Website or Platforms except when otherwise required under applicable laws.
- meet your reasonable expectations of data privacy while processing your Personal Data.
- undertake reasonable efforts and security measures, including, a variety of security technologies and procedures to protect your Personal Data from any unauthorized access, use or disclosure.
- provide you all information related to processing of your Personal Data, for instance whether or not your Personal Data is being processed, where it is processed and for what purpose it is processed, upon receipt of a written request from you

Notwithstanding anything provided in this Policy, Chatur Wealth does not guarantee that your personal data will be absolutely protected at all times. Websites' systems and the communications networks through which you access the Website or Platforms may be subject to security breaches and failures due to circumstances beyond the reasonable control of Chatur Wealth. In such situations Chatur Wealth will try to rectify the problems at the earliest feasible time. You hereby acknowledge and understand that all personal information provided to or through the Website or Platforms is with your knowledgeable and informed consent and solely at your own risk.

## 6. RIGHTS OF USER

**Right of Erasure:** If you wish to remove all or any part of your Personal Data collected by Chatur Wealth, its affiliates or any of the related parties, you can raise a request by sending an email to [deveshchawla@chaturideas.com](mailto:deveshchawla@chaturideas.com) or contact any of Chatur Wealth's representatives. Your Personal Data will be erased by Chatur Wealth upon receipt of such request for erasure.

## 7. THIRD PARTY LINKS/ EXTERNAL LINKS

Our Website or Platforms may contain links to content or other functionality provided by third parties which are outside our control and are not covered by this Policy. Accordingly, Chatur Wealth shall not be liable for any breach of your Personal Data which is attributable to the acts or omissions of such third parties.

## 8. BREACH NOTIFICATION

Chatur Wealth shall intimate any instances of data breach to you without any undue delay and, where feasible, within 72 hours of becoming aware of such breach, failing which Chatur Wealth shall provide reasoned justification for the delay. However, Chatur Wealth shall not be liable to notify you about any minor breach which is unlikely to result in a risk to your rights and freedoms related to your Personal Data. Further, Chatur Wealth shall take all reasonable steps to curb such instances and take all corrective measures to minimize the impact of such a data breach.

## 9. COOKIES & OTHER INFORMATION

What are cookies: Cookies are small text files that are placed on your web browser by Websites that you visit, in order to make Websites work more efficiently and generate user specific content and tools.

Why we use cookies: Chatur Wealth uses cookies and other tracking technologies that store data temporarily; the data collected may be stored in your browser. We do not use cookies to transmit any personal information. We use cookies and other tracking technologies to improve the usage and functionality of the Websites and to gain a better understanding of how visitors use the Websites and utilize the tools and services offered to them. Cookies help us tailor the Websites to user specific needs and preferences and improve various functionalities and user interface, resulting in greater customer satisfaction.

What types of cookies we may use.

i. Persistent Cookies: It helps recognize you as an existing user, and use our services without signing in again. After you sign in, it stays in your browser and

will be read by Chatur Wealth when you return to our Website after navigating to other websites or tabs.

ii. Session Cookies: The technical information stored by session cookies lasts as long as the current web session (usually your current visit to a website or a browser session) persists.

iii. Analytics Cookies: These cookies track information about how a user uses the Platforms. Analytics cookies may either be first party cookies or third party cookies. These cookies allow our Website to provide you a more personalized online experience.

We are currently not SEBI registered but trying to get it soon. Please be aware there are risks in trading and your capital maybe destroyed completely.

Whether you can opt out of cookies: With most Internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please refer to your web browser instructions or help screen to learn more about these functions. However, if you reject cookies, the functionality of our offerings may be restricted.

## 10. OTHER TRACKING TECHNOLOGIES USED

Chatur Wealth uses tracking technologies such as Google Analytics , a web analytics service provided by Google, Inc. (" Google"). Google Analytics uses analytics cookies, which generate information about your use of the Website (including your IP address). Google will only use Anonymous Data and other related information stored during your use of the Website, in Google servers, for the purpose of evaluating your use of the Website, compiling reports of your activities on the Websites, and providing other related services. You may refuse the use of the tracking technologies by selecting the appropriate settings on your web browser as mentioned earlier. However, please note that in case you opt out of use of the tracking technologies, you may not be able to use the full functionality of the Websites.

## 11. COMMUNICATION & GRIEVANCES

We will make all attempts to contact you only through email and ensure that your telephone number is used only for the limited purposes of providing the relevant services on the Website or Platforms. In case you have any grievances regarding usages of your Personal Data, you can contact us at [deveshchawla@chaturideas.com](mailto:deveshchawla@chaturideas.com). Upon receipt of such complaint, Chatur Wealth will make all the reasonable efforts to address your concerns at the earliest.

## 12. CONSENT

On visiting the Website or Platforms of Chatur Wealth, you hereby acknowledge and confirm that:

- you have read, reviewed and understood all the terms of this Policy and its implications and voluntarily agreed to provide your explicit consent for access and usages of your Personal Data for the purpose specified under this Policy
- you have been apprised of your right to withdraw your consent.